


# Exhibit 3

**From:** Ezra Young [ezra@ezrayoung.com](mailto:ezra@ezrayoung.com)   
**Subject:** Re: Request for Certification of Non-Compliance: Tudor v Galindo, 5:22-cv-00480-JD  
**Date:** February 15, 2024 at 3:05 PM  
**To:** Michelle Cercone Roudebush [Michelle\\_Cercone\\_Roudebush@okwd.uscourts.gov](mailto:Michelle_Cercone_Roudebush@okwd.uscourts.gov)  
**Cc:** Brittany Stewart [brittany.novotny@gmail.com](mailto:brittany.novotny@gmail.com), Jillian Weiss [jweiss@jtweisslaw.com](mailto:jweiss@jtweisslaw.com), Dixie Coffey [dixie.coffey@oag.ok.gov](mailto:dixie.coffey@oag.ok.gov),  
Jeb Joseph [jeb.joseph@oag.ok.gov](mailto:jeb.joseph@oag.ok.gov), Jerry Colclazier [jerry@colclazier.com](mailto:jerry@colclazier.com), Blake Patton [bpatton@gablelaw.com](mailto:bpatton@gablelaw.com), Lori Cornell  
[lori.cornell@oag.ok.gov](mailto:lori.cornell@oag.ok.gov), Marie Galindo Attorney [MarieEiselaGalindo@gmail.com](mailto:MarieEiselaGalindo@gmail.com)

Judge Erwin:

We write (again) to notify you of yet another violation of the confidentiality component of your judicial settlement conference order (ECF No. 44). We ask you this time to issue a certification of non-compliance of the confidentiality provision of your settlement order citing Dr. Tudor and Mr. Colclazier.

Attached to this email please find correspondence between Jerry Colclazier and the Oklahoma Bar Association. On Dr. Tudor's behalf, Mr. Colclazier filed an ethics grievance against Ms. Stewart in which he transmitted the January 5 letter (the same which Ms. Weiss disclosed the substance of to the Court via public docket).

We have included the pertinent portions of the OBA documentation as attachments to this email. If any additional documentation is required please let us know.

With much respect,

Ezra



2024-2-6 OKB  
Compl...es).pdf

On Feb 14, 2024, at 11:39 AM, Ezra Young <[ezra@ezrayoung.com](mailto:ezra@ezrayoung.com)> wrote:

Judge Erwin:

We write to notify you that Jillian Weiss filed a brief on the docket yesterday (ECF No. 71) which discloses the substance of our settlement demand made pursuant to your judicial settlement conference order (ECF No. 44).

As the email thread below reflects, we promptly notified Ms. Weiss that disclosure of our demand, made in a January 5, 2024 letter correcting our settlement statement, violates the confidentiality terms of your order. Ms. Weiss rebuffed our attempts to seek a private cure of this disclosure by claiming our January 5 letter was made "after the settlement conference" that occurred on January 9, 2024. Additionally, Ms. Weiss has refused any further conferral to resolve this problem privately.

We humbly ask that you make a certification of non-compliance with the confidentiality terms of your settlement order.

Attached to this email please find a copy of your settlement conference order, Ms. Weiss' filing, as well as our January 5 letter. (Pertinent parts are highlighted.)

With much respect,

Ezra Young and Brittany Stewart  
<2024-2-13 Weiss Response (Fees Dispute).pdf>  
<2023-10-6 Order Setting Settlement Conf.pdf>  
<2024-1-5 Ltr to JC re Offer.pdf>

Begin forwarded message:

**From:** Jillian Weiss <[jweiss@jtweisslaw.com](mailto:jweiss@jtweisslaw.com)>  
**Subject:** Re: Activity in Case 5:22-cv-00480-JD Tudor v. Galindo et al Response  
**Date:** February 13, 2024 at 11:06:18 PM EST  
**To:** Ezra Young <[ezra@ezrayoung.com](mailto:ezra@ezrayoung.com)>  
**Cc:** Brittany Stewart <[brittany.novotny@gmail.com](mailto:brittany.novotny@gmail.com)>

This communication was made after the settlement conference, and was not part of the settlement conference. You waived confidentiality by so doing. That is my final response.

Jillian T. Weiss  
(845) 709-3237

On Tue, Feb 13, 2024 at 10:10 PM Ezra Young <[ezra@ezrayoung.com](mailto:ezra@ezrayoung.com)> wrote:  
Jill:

We have reviewed your responsive brief filed as ECF No. 71 in the interpleader case. We write to confer with you about corrective action necessary with respect to confidential settlement communications we made via letter on January 5, 2024.

In your filing at page two, footnote two you state, in pertinent part: "On January 5, 2024, they sent a letter to the parties stating their demand is \$1,750,269.26, based on their hourly billing, of which \$102,240 is for Ms. Stewart, and the remainder for Mr. Young." We believe that this disclosure—of the content and substance of our settlement demand, transmitted to you and the other parties—violates Judge Erwin's settlement conference order (ECF No. 44).

Confidentiality of our statement is set forth in ¶ 7 of Judge Erwin's order ("The settlement conference statements and all communications occurring during the settlement conference are confidential and, except as otherwise permitted under Fed. R. Evid. 408 or other provisions of federal law, cannot be used by any party in the trial of the case.").

We intend to reach out to Judge Erwin—and will cc all parties on that email—to request a certification of your noncompliance with the confidentiality provisions of his order.

Please advise as to your position on our request.

Ezra and Brittany

Begin forwarded message:

**From:** [okwd\\_ecf\\_notice@okwd.uscourts.gov](mailto:okwd_ecf_notice@okwd.uscourts.gov)  
**Subject:** Activity in Case 5:22-cv-00480-JD Tudor v. Galindo et al Response  
**Date:** February 13, 2024 at 9:20:28 PM EST  
**To:** [okwdecf@okwd.uscourts.gov](mailto:okwdecf@okwd.uscourts.gov)

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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U.S. District Court

Western District of Oklahoma[LIVE]

### Notice of Electronic Filing

The following transaction was entered by Weiss, Jillian on 2/13/2024 at 8:20 PM CST and filed on 2/13/2024

**Case Name:** Tudor v. Galindo et al  
**Case Number:** [5:22-cv-00480-JD](#)  
**Filer:** The Law Office of Jillian T. Weiss, P.C.  
**Document Number:** [71](#)

#### Docket Text:

**RESPONSE re [63] Order for Responsive Brief filed by The Law Office of Jillian T. Weiss, P.C.. (Weiss, Jillian)**

**5:22-cv-00480-JD Notice has been electronically mailed to:**

Brittany M Novotny [brittany.novotny@gmail.com](mailto:brittany.novotny@gmail.com)

Dixie L Coffey [dixie.coffey@oag.ok.gov](mailto:dixie.coffey@oag.ok.gov), [becky.sunderland@oag.ok.gov](mailto:becky.sunderland@oag.ok.gov), [docket@oag.ok.gov](mailto:docket@oag.ok.gov), [lori.cornell@oag.ok.gov](mailto:lori.cornell@oag.ok.gov), [riskdocket@omes.ok.gov](mailto:riskdocket@omes.ok.gov)

Ezra I Young [ezra@ezrayoung.com](mailto:ezra@ezrayoung.com)

Jerry L Colclazier [jerry@colclazier.com](mailto:jerry@colclazier.com), [amie@colclazier.com](mailto:amie@colclazier.com)

Jillian T Weiss [jweiss@jtweisslaw.com](mailto:jweiss@jtweisslaw.com), [admin@jtweisslaw.com](mailto:admin@jtweisslaw.com)

Jon Blake Patton [bpattton@gablelaw.com](mailto:bpattton@gablelaw.com), [dbrown@transgenderlegal.org](mailto:dbrown@transgenderlegal.org), [hmilligan@gablelaw.com](mailto:hmilligan@gablelaw.com),  
[sduncan@transgenderlegal.org](mailto:sduncan@transgenderlegal.org)

Marie E Galindo [AttorneyMarieEiselaGalindo@gmail.com](mailto:AttorneyMarieEiselaGalindo@gmail.com)

Shon T Erwin [erwin-orders@okwd.uscourts.gov](mailto:erwin-orders@okwd.uscourts.gov)

**5:22-cv-00480-JD Notice has been delivered by other means to:**

Jillian T Weiss

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1041971380 [Date=2/13/2024] [FileNumber=5232967-0  
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